

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEMETRIUS JOHNSON,

Plaintiff,

v.

REYNALDO GUEVARA, et al.,

Defendants.

Case No. 20-cv-4156

Judge Sara L. Ellis

Magistrate Judge Heather K. McShain

JURY TRIAL DEMANDED

PLAINTIFF'S OPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES

Plaintiff DEMETRIUS JOHNSON, by and through his attorneys, hereby moves this Court to grant him leave to file his Consolidated Response in Opposition to Defendants' Motions Regarding Summary Judgment in excess of fifteen (15) pages. In support, Plaintiff states:

1. On January 22, 2024, Defendants Darryl Daley and Geri Lynn Yanow, as Special Representative for Ernest Halverson, William Erickson, and John Healy, filed an Opposed Motion for Additional Time to File Their Motion on Disputes in the Joint Statement of Facts and Summary Judgment, Dkt. 290, and accompanying exhibits.

2. On January 23, 2024, Defendant City of Chicago filed its Opposed Motion for Leave to File Excess Pages, Dkt. 292, along with an eighteen-page Motion to Deem Facts Set Forth in the City’s Proposed Joint Statement of Facts as Admitted, Dkt. 292-1, and accompanying exhibits.

3. In the City's Motion, it stated that "significant issues arose while the parties where [sic] working on the Joint Statement of Material Facts," and that, given the "importance" of the various issues that needed to be addressed "and the limited time the City was left to draft the Motion," it could not comply with the fifteen-page limit. Dkt. 292 at 1.

4. Although Plaintiff vehemently disagrees with Defendants' motions, they do not oppose Defendants' motion for leave to exceed fifteen pages.

5. In response to both Motions filed yesterday, Plaintiff seeks to file a consolidated Response to the Defendants' motions. And to address the many issues raised in Defendants' motions, Plaintiff's Consolidated Response also requires more than fifteen pages. The Response is attached here as Exhibit 1.

6. In an effort to get this issue briefed with as much time as possible for the Court to consider the parties' dispute, Plaintiff has worked hard to get his response on file today, one day after Defendants filed their motions. Thus, Plaintiff too has not had time to confer with the Defendants on this Motion for leave to exceed fifteen pages, and is filing the motion as opposed.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests this Court grant his motion for leave to file his Consolidated Response in Opposition to Defendants' Motions Regarding Summary Judgment in excess of 15 pages, and grant such further relief as this Court deems just and equitable.

RESPECTFULLY SUBMITTED,

/s/ Alyssa Martinez
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Alyssa Martinez, an attorney, certify that on January 23, 2024, I filed the foregoing document using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Alyssa Martinez
One of Plaintiff's Attorneys